

Steve W. Berman (*Pro Hac Vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
steve@hbsslaw.com

Elizabeth J. Cabraser (083151)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
ecabraser@lchb.com

Steven N. Williams (175489)
COTCHETT, PITRE & McCARTHY, LLP
840 Malcolm Road
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
swilliams@cpmlegal.com

Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)

MDL No. 2420

This Documents Relates to:
ALL INDIRECT PURCHASER ACTIONS

ADMINISTRATIVE MOTION TO FILE
UNDER SEAL

DATE ACTION FILED: Oct. 3, 2012

Indirect Purchaser Plaintiffs (IPPs) bring this administrative motion pursuant to Civil Local Rule 7-11 and 79-5, to file under seal the following documents:

1. Indirect Purchaser Plaintiffs' Renewed Motion For Class Certification;
2. Supplemental Expert Report of Edward E. Leamer, Ph.D. and;
3. Exhibit 260 through Exhibit 273, and Exhibit 276 through Exhibit 280 to the Declaration of Shana E. Scarlett in Support of Indirect Purchaser Plaintiffs' Renewed Motion for Class Certification.

The above documents contain information designated by defendants as "Confidential," or "Highly Confidential" under the Stipulated Protective Order ("Protective Order") in place in this action.¹ The Protective Order requires that information designated as confidential "qualify for protection under standards developed under Fed. R. Civ. P. 26(c)."² In turn, under Rule 26(c), a Court may require "that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specified way."³

Pursuant to the Protective Order and Civil Local Rule 79-5(d), the designating parties must now demonstrate that the designated information is sealable or must withdraw the designation of confidentiality.

DATED: September 26, 2017

HAGENS BERMAN SOBOL SHAPIRO LLP

By s/Shana E. Scarlett
SHANA E. SCARLETT

Steve W. Berman (*pro hac vice*)
Jeff D. Friedman (173886)
Benjamin J. Siegel (256260)
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
steve@hbsslaw.com
jefff@hbsslaw.com

¹ Stipulated Protective Order, May 17, 2013, ECF No. 193.

² *Id.*, ¶ 2.3.

³ Fed. R. Civ. P. 26(c)(1)(G).

shanas@hbsslaw.com

DATED: September 26, 2017

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By s/ Brendan P. Glackin
BRENDAN P. GLACKIN

Elizabeth J. Cabraser (SBN 083151)
Lin Y. Chan (SBN 255027)
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
ecabraser@lchb.com
bglackin@lchb.com
lchan@lchb.com

DATED: September 26, 2017

COTCHETT, PITRE & McCARTHY, LLP

By s/Steven N. Williams
STEVEN N. WILLIAMS

Joyce Chang (SBN 300780)
840 Malcolm Road
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
swilliams@cpmlegal.com
jchang@cpmlegal.com

***Interim Co-Lead Class Counsel
For Indirect Purchaser Plaintiffs***